

The FCC and its administration of part 97 of the rules has been evolving for many years. The recurring pattern is that as radio and electronic technology evolve, the FCC eventually must consider evolving its rules as well.

Since 1968, the FCC has fully supported an incentive-based amateur radio licensing structure, in which greater operating privileges are granted by way of testing candidates for greater knowledge, and by a candidate passing a test to gain access to those greater operating privileges. In the matter of RM-11828, the FCC is proposing to grant greater phone operating privileges to Technician class licensees who will have not yet been tested for their greater knowledge appropriate to such phone privileges in portions of the 75, 40, and 15 meter bands. In addition, RM-11828 proposes to grant additional privileges for RTTY and digital modes on 80, 40, 15, and 10 meters, also without testing for appropriate knowledge.

The ARRL, in which organization I have been a member of in good standing for over 35 years, makes the claim that the passage and adoption of RM-11828 will "... provide an improved incentive for entry-level licensees to increase technical self-training and pursue higher license class achievement and development of communications skills." I believe that this argument falls flat, as it would essentially be a "gift" to current and future Technician class licensees. The proposal, if adopted, would grant additional privileges which current General class licensees had to earn by passing a test for that class¹.

It is for all of the above reasons that I stand opposed to the FCC proposed notice of rule making RM-11828.

However, I believe that a fair and equitable alternative to RM-11828 would be for the FCC to consider creating a new license class, as the Commission has done in the past, giving Technician class licensees an incentive to earn the proposed additional operating privileges below 10 meters by way of creating a new test for that purpose and class. In keeping with the FCC's incentive-based licensing, this would also require the development of a new test for such license class. Upon a Technician class licensee passing such a test, they would then be granted the additional operating privileges. In this way, the incentive-based licensing structure for amateur radio would be preserved, and in a manner consistent with the FCC's incentive-based goals.

¹ While true that the FCC did eliminate the Morse Code requirement for amateur radio licensing effective 2/2007, the intent was to be aligned and consistent with the evolving ITU rules for other countries' amateur radio licensing policies, and the FCC applied the change across all license classes equally.